1 2 3 4 5	NICHOLAS A. TRUTANICH United States Attorney Nevada Bar Number 13644 KIMBERLY M. FRAYN Assistant United States Attorney 501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101 Tel: 702.388.6546/ Fax: 702.388.6418 Kimberly.Frayn@usdoj.gov	
6	Attorneys for the United States	
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
8	DISTRICTO	INLVADA
9	UNITED STATES OF AMERICA,	Case No. 2:20-mj-1038-NJK
9	Plaintiff,	Stipulation for an Order
10	,	Directing Probation to Prepare
11	V.	a Criminal History Report
	MARBIN RAMIREZ-RODAS,	
12	Defendant.	
13	Detendant.	
14	IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.	
15	Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United States	
16	Attorney, counsel for the United States of America, and Raquel Lazo, Assistant Federal	
17	Public Defender, counsel for Defendant MARBIN RAMIREZ-RODAS,	
18	that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's	
19	criminal history.	
20	This stipulation is entered into for the following reasons:	
21	1. The government has made a plea offer in this case, which the defendant has	
22	accepted. He has executed a written plea agreement and waived indictment. A hearing for	
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1	the change of plea has not yet been set. The parties will jointly request an expedited	
2	sentencing immediately after the defendant enters a guilty plea.	
3	2. The U.S. Probation Office cannot begin obtaining the defendant's criminal	
4	history until after the defendant enters his guilty plea unless the Court enters an order	
5	directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of	
6	a defendant's initial appearance when charged by indictment.	
7	3. The U.S. Probation Office informs the government that it would like to begin	
8	obtaining the criminal history of defendants looking for an expedited sentencing as soon as	
9	possible after their initial appearance so that the Probation Office can complete the	
10	Presentence Investigation Report by the time of the expected expedited sentencing.	
11	4. Accordingly, the parties request that the Court enter an order directing the	
12	U.S. Probation Office to prepare a report detailing the defendant's criminal history.	
13	DATED this1st day of February, 2021.	
14	Respectfully submitted,	
15	NICHOLAS A. TRUTANICH	
16	United States Attorney	
17	/s/Raquel Lazo /s/Kimberly M. Frayn RAQUEL LAZO KIMBERLY M. FRAYN	
18	Assistant Federal Public Defender Counsel for Defendant Assistant United States Attorney	
19	MARBIN RAMIREZ-RODAS	
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UNITED STATES DISTRICT COURT 1 **DISTRICT OF NEVADA** 2 UNITED STATES OF AMERICA, Case No. 2:20-mj-1038-NJK 3 Plaintiff, Stipulation for an Order **Directing Probation to Prepare** 4 a Criminal History Report v. 5 MARBIN RAMIREZ-RODAS, 6 Defendant. 7 Based on the stipulation of counsel, good cause appearing, and the best interest of 8 9 justice being served: IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a 10 11 report detailing the defendant's criminal history. 12 DATED: February 2, 2021. 13 14 HONORABLE NANCY J. KOPPE UNITED STATES MAGISTRATE JUDGE 15 16 17 18 19 20 21 22 23 24